

REMARKS

The Office Action dated July 22, 2004, has been received and carefully considered. In this response, reconsideration of the outstanding objections/rejections in the present application is respectfully requested based on the following remarks.

I. THE ANTICIPATION REJECTION OF CLAIMS 1-14 and 16-39

On page 3 of the Office Action, claims 1, 2, 5, 6, 9, 17-21, 23 and 33-38 were rejected under 35 U.S.C. § 102(b) as being anticipated by Coyle et al. (U.S. Patent No. 5,003,463). On page 4 of the Office Action, claims 1-14 and 17-39 were rejected under 35 U.S.C. § 102(e) as being anticipated by Garlepp et al. (U.S. Patent No. 6,687,780 B1). On page 6 of the Office Action, claims 10-16 and 24-32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Borkar et al. (U.S. Patent No. 5,604,450). On page 8 of the Office Action, claims 10-16 and 24-32 were rejected under 35 U.S.C. § 102(e) as being anticipated by Ishibashi et al. (U.S. Patent No. 5,872,471). These rejections are hereby respectfully traversed.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a *prima facie* case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished). Anticipation requires that a prior art reference disclose,

either expressly or under the principles of inherency, each and every element of the claimed invention. Id. "In addition, the prior art reference must be enabling." Akzo N.V. v. U.S. International Trade Commission, 808 F.2d 1471, 1479, 1 USPQ2d 1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987). That is, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In re Donohue, 766 F.2d 531, 533, 226 USPQ 619, 621 (Fed. Cir. 1985). "Such possession is effected if one of ordinary skill in the art could have combined the publication's description of the invention with his own knowledge to make the claimed invention." Id.

A. COYLE ET AL. REFERENCE

With respect to the Coyle et al. reference, the Office Action asserts that Coyle et al. teach the present invention as claimed. However, the Office Action fails to explain how Coyle et al. teach, or even suggest, "simultaneously transmitting a first portion of the first set of data from the first device to the second device over the common bus and transmitting a second portion of the first set of the data from the second device to the first device over the common bus," as recited in claim 1.

Similar limitations are prevalent in independent claims 6, 17, 33 and 39.

The Office Action specifically asserts that Coyle et al. disclose a first device (18/20 and SBI 0 or MCU 22) operably coupled to a bus (SB 12), a second device (IOP 1 or MEM 0) operably coupled to the bus (SB 12), the first device (18/20 and SBI 0 or MCU 22) transmitting a first portion of a first set of data to the second device (IOP 1 or MEM 0) and the second device (IOP 1 or MEM 0) transmitting a second portion of the first set of data to the first device (18/20 and SBI 0 or MCU 22) simultaneously during a first exchange slot position.

The Office Action fails to mention how first data is transmitted from a first device to a second device and second data is transmitted from the second device to the first device, ***simultaneously over a common bus.*** This claimed feature is clearly not supported structurally by Coyle et al. nor is it supported by the description provided by Coyle et al.. On page 12, the Office Action alleges that the IOP 1 or MEM 0 are operably coupled to the non-interlocked bus SB 12 and transmit sets of data over the bus SB 12 via I/O bus 42 or MEM bus 24. However, there is no support in Coyle et al. of any simultaneous transmission of data between a first device and a second device over a common bus. Rather, without any basis, the Office Action

asserts that "common bus SB 12 does not prevent operation (data transmission of one device from interfering with another." However, a proper rejection under 35 U.S.C. § 102 requires more than just an assertion that a reference does not prevent a certain claimed operation. Instead, a valid disclosure of each and every claim limitation must be shown in a single reference.

The claims recite simultaneously transmitting data "over the common bus." The Office Action, however, makes no mention of how Coyle et al. teach simultaneous transmission of data over a common bus. In fact, the Office Action completely fails to address this feature.

Further, the structure of Coyle et al. relied upon by the Office Action fails to support the allegations made by the Office Action. The first device (18/20 and SBI 0 or MCU 22) and second device (IOP 1 or MEM 0) do not transmit data simultaneously through system bus SB 12. Rather, second device IOP 1 and second device MEM 0 transmit data through IO BUS 42 and MEM BUS 24, respectively. First device 18/20 transmits data through common bus SB 12. First device SBI 0 transmits data to second device IOP 1 through IO BUS 42. First device MCU 22 transmits data to second device MEM 0 through MEM BUS 24. As supported by Coyle et al., SBI 034 communicates with the IOP's 44-50 through the IO BUS 42 and with the other system elements

(18, MCU 22) through the System Bus 12 (column 8, lines 23-26). Thus, as supported by the structure of FIG. 1 and the description provided by Coyle et al., data from a first device and a second device are not transmitted **simultaneously over a common bus**. Rather, the system of Coyle et al. transmits data through a plurality of buses where transmission is not simultaneous over a common bus. This claimed feature directed to simultaneous transmission over a common bus is clearly not supported by the structure and description of Coyle et al..

In a similar manner, Coyle et al. further fail to disclose a third device (IOP 2 or MEM 1) transmitting data to the first device (18/20 and SBI 0 or MCU 22) over a common bus simultaneously during a second exchange slot. Again, as multiple buses are used to exchange data by Coyle et al., the combination of claim limitations are clearly not shown in Coyle et al..

On pages 3-4, the Office Action asserts that "[w]ith regards to claims 1-5, one using the device of Coyle et al. would have performed the same steps set forth in claims 1-5" and "[w]ith regards claims 33-38, one using the system of Coyle et al. would have performed the same steps set forth in claims 33-38. See above explanation regarding claims 1-9." These allegations are confusing, at best. On page 3, the Office

Action makes reference to claims 1-5 and 1-9, when claims 1, 2, 5, 6 and 9 have been rejected by Coyle et al.. The Office Action asserts that one "would have" performed the same steps. A rejection under 35 U.S.C. § 102 requires that each and every limitation be shown in a single reference - not whether a limitation "would have" been performed. Also, the Office Action has provided no basis that such steps "would have" been performed by Coyle et al..

In response to the Examiner's remarks, the Office Action relies upon mere possibilities and what might happen in the Coyle et al. reference as opposed to what is actually disclosed. The Examiner contends that the common bus SB 12 "does not prevent operation" but fails to point out where the claimed limitations are actually disclosed in the Coyle et al. reference. Under the Examiner's logic, essentially anything is possible. The Examiner further bases the rejection on the belief that the Applicant has disclosed what is identical to the system of Coyle et al. Applicant further disagrees that Figures 4-7 as described by the instant specification are identical to Figure 1 of Coyle et al..

For at least the reasons discussed above, it is respectfully requested that the aforementioned anticipation rejection of claims 1, 2, 5, 6, 9, 17-21, 23 and 33-38 be

withdrawn. It is noted that the rejection of claim 39 has been withdrawn.

B. GARLEPP ET AL. REFERENCE

With respect to the Garlepp et al. reference, the Office Action asserts that Garlepp et al. teach the present invention as claimed. Applicant respectfully disagrees with the assertions made by the Office Action. In addition, Applicant notes that (1) the present application and Garlepp et al. have a common inventor, Frederick A. Ware, and (2) the present application and Garlepp et al. are commonly owned. Applicant reserves the right to claim priority to Garlepp et al. or to swear behind the filing date of Garlepp et al. under a 37 C.F.R. § 1.131 Declaration. While Applicant retains the right to perform either action, it is believed that Garlepp et al. fails to disclose the claimed invention as recited by Applicant.

With respect to the Garlepp et al. reference, the Office Action asserts that Garlepp et al. teach the present invention as claimed. However, the Office Action fails to explain how Garlepp et al. teach, or even suggest, "simultaneously transmitting a first portion of the first set of data from the first device to the second device over the common bus and transmitting a second portion of the first set of the data from

the second device to the first device over the common bus," as recited in claim 1. Similar limitations are prevalent in independent claims 6, 17, 33 and 39.

The Office Action specifically asserts that Garlepp et al. disclose a first device 256 operably coupled to a bi-directional bus 252, 254, a second device 262-1 where the first device 256 transmits a first portion of a first set of data to the second device 256 and the second device 262-1 transmits a second portion of the first set of data to the first device 256 simultaneously during a first exchange slot. (Garlepp et al., Figure 11).

The Office Action fails to mention how first data is transmitted from a first device to a second device and second data is transmitted from the second device to the first device, ***simultaneously over a common bus.*** This claimed feature is clearly not supported structurally by Garlepp et al. nor is it supported by the description provided by Garlepp et al.. In fact, there is no support in Garlepp et al. of any simultaneous transmission of data between a first device and a second device ***over a common bus.*** Rather, without any basis, the Office Action asserts that Garlepp et al. disclose a device "capable of simultaneous bi-directional signaling." (see page 5 of the Office Action mailed 7/22/04). However, a proper rejection

under 35 U.S.C. § 102 requires more than just an unfounded belief that a reference could be capable of a certain claimed operation. Instead, a valid disclosure of each and every claim limitation must be shown in a single reference.

As clearly shown in Figure 11, the structure of Garlepp et al. discloses two separate buses, where transmission of data from the first device 256 to the second device 262-1 occurs through a first BUS 252 and transmission of data from the second device 262-1 to the first device 256 occur through a second BUS 256.

The claims recite simultaneously transmitting data "over the common bus." The Office Action, however, fails to explain how Garlepp et al. teach simultaneous transmission of data over a common bus. It is further unclear as to how the two separate buses 252 (supporting data transmission in one direction) and 254 (supporting data transmission in another direction) could be interpreted as a common bus for simultaneous transmission of data. Therefore, the structure of Garlepp et al. relied upon by the Office Action clearly fails to support the allegations made by the Office Action.

C. BORKAR ET AL. REFERENCE

With respect to the Borkar et al. reference, the Office Action asserts that Borkar et al. teach the present invention as claimed. However, the Office Action fails to explain how Borkar et al. teach, or even suggest, "a driver configured to provide additive signaling, the driver applying transmit signals to the bus" and "a receiver circuit operably coupled to the driver, the receiver circuit configured to effectively subtract the transmit signals to receive received signals from the bus, the driver and the receiver circuit operating during an exchange slot," as recited in independent claim 10.

Further, the Office Action fails to explain how Borkar et al. teach, or even suggest, "a driver configured to drive a bus with read data during an exchange slot while write data are present on the bus;" "a receiver circuit operably coupled to the driver, the receiver circuit configured to receive the write data from the bus during the exchange slot while the driver is driving the bus with the read data;" and "a memory circuit operably coupled to the receiver circuit, the memory circuit configured to provide the read data and to store the write data," as recited in independent claim 24.

In addition, the Office Action fails to explain how Borkar et al. teach, or even suggest, "a driver configured to drive a bus with first write data destined for a first memory device

during a first exchange slot while first read data from the first memory device are present on the bus" and "a receiver circuit operably coupled to the driver, the receiver circuit configured to receive the first read data from the bus during the first exchange slot while the driver is driving the bus with the first write data," as recited in independent claim 28.

The Office Action addresses the claims (in particular, claims 10, 14 and 15) as containing the phrase "capable of," which according to the Office Action performs a function that is not a positive limitation but only requires the ability to so perform. In addition, the final Office Action of July 22, 2004 now includes a new argument that the phrase "adapted to" in claim 14 and 15 performs a function that is not a positive limitation. The Office Action further asserts that these phrases do not constitute a limitation in any patentable sense. Applicant respectfully notes that none of claims 10, 14 or 15 contain either phrase. Examiner is requested to provide clarification to these assertions. These claims were previously amended in the Amendment dated October 16, 2003 to recite "a driver configured to provide" in claim 10; "transmit buffers configured to hold data" in claim 14 and "the comparator configured to effectively subtract" in claim 15. In addressing these claims, it is clear that the Office Action has failed to

provide proper patentable weight to the recitations. More specifically, the Office Action has improperly construed claims based on terms not recited in the claims. Applicants assert that these claims recite positive limitations that have not been properly addressed by the Office Action.

With respect to independent claim 10, Borkar et al. fails to show at least a driver configured to provide additive signaling; a receiver circuit configured to effectively subtract the transmit signals to receive received signals from the bus, the driver and the receiver circuit operating during an exchange slot.

Claim 12 recites a "terminator operably coupled to the driver and the receiver circuit." However, Borkar et al. specifically teaches that a terminator is not used. "The scheme is self terminating, so that no explicit terminations are required to properly terminate a transmission line" (column 7, lines 29-33).

In addressing independent claims 24 and 28, the Office Action merely states that one using the memory system of Borkar et al. would have performed the same steps set forth in claims 24-32. Applicant respectfully disagrees. First of all, claims 24 and 28 are apparatus claims, not method claims containing method steps. Secondly, independent claims 24 and 28 recite

limitations that have not been properly addressed by the Office Action. As the Office Action has failed to meet its burden, the rejections are improper and should be withdrawn.

In response to the Examiner's remarks, the Examiner contends that the terms "capable of" and "adapted to" do not recite a positive limitation and therefore have not given these limitations any patentable weight. Applicants request clarification as these phrases are no where to be found in any of the pending claims. It is clear that the rejection is improper on the basis that the Examiner has improperly ignored positively recited claim limitations. For at least these reasons, the rejections are improper and should be withdrawn.

D. ISHIBASHI ET AL. REFERENCE

With respect to the Ishibashi et al. reference, the Office Action asserts that Ishibashi et al. teach the present invention as claimed. However, the Office Action fails to explain how Ishibashi et al. teach, or even suggest, "a driver configured to provide additive signaling, the driver applying transmit signals to the bus" and "a receiver circuit operably coupled to the driver, the receiver circuit configured to effectively subtract the transmit signals to receive received signals from the bus,

the driver and the receiver circuit operating during an exchange slot," as recited in independent claim 10.

Further, the Office Action fails to explain how Ishibashi et al. teach, or even suggest, "a driver configured to drive a bus with read data during an exchange slot while write data are present on the bus;" "a receiver circuit operably coupled to the driver, the receiver circuit configured to receive the write data from the bus during the exchange slot while the driver is driving the bus with the read data;" and "a memory circuit operably coupled to the receiver circuit, the memory circuit configured to provide the read data and to store the write data," as recited in independent claim 24.

In addition, the Office Action fails to explain how Ishibashi et al. teach, or even suggest, "a driver configured to drive a bus with first write data destined for a first memory device during a first exchange slot while first read data from the first memory device are present on the bus" and "a receiver circuit operably coupled to the driver, the receiver circuit configured to receive the first read data from the bus during the first exchange slot while the driver is driving the bus with the first write data," as recited in independent claim 28.

The Office Action addresses the claims (in particular, claims 10, 14 and 15) as containing the phrase "capable of,"

which according to the Office Action performs a function that is not a positive limitation but only requires the ability to so perform. The Office Action further asserts that it does not constitute a limitation in any patentable sense. Applicant respectfully notes that none of claims 10, 14 or 15 contain that phrase. These claims were previously amended in the Amendment dated October 16, 2003 to recite "a driver configured to provide" in claim 10; "transmit buffers configured to hold data" in claim 14 and "the comparator configured to effectively subtract" in claim 15. In addressing these claims, it is clear that the Office Action has failed to provide proper patentable weight to the recitations. More specifically, the Office Action has improperly construed claims based on terms not recited in the claims. Applicants assert that these claims recite positive limitations that have not been properly addressed by the Office Action.

With respect to independent claim 10, Ishibashi et al. fails to show at least a driver configured to provide additive signaling; a receiver circuit configured to effectively subtract the transmit signals to receive received signals from the bus, the driver and the receiver circuit operating during an exchange slot.

In addressing independent claims 24 and 28, the Office Action merely states that one using the memory system of Ishibashi et al. would have performed the same steps set forth in claims 24-32. Applicant respectfully disagrees. First of all, claims 24 and 28 are apparatus claims, not method claims containing method steps. Secondly, independent claims 24 and 28 recite limitations that have not been properly addressed by the Office Action. As the Office Action has failed to meet its burden, the rejections are improper and should be withdrawn.

In response to the Examiner's remarks, the Examiner contends that the terms "capable of" and "adapted to" do not recite a positive limitation and therefore have not given these limitations any patentable weight. Applicants request clarification as these phrases are no where to be found in any of the pending claims. It is clear that the rejection is improper on the basis that the Examiner has improperly ignored positively recited claim limitations. For at least these reasons, the rejections are improper and should be withdrawn.

E. DEPENDENT CLAIMS

Claims 2-5 are dependent upon independent claim 1. Thus, since independent claim 1 should be allowable as discussed above, claims 2-5 should also be allowable at least by virtue of

their dependency on independent claim 1. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 7-9 are dependent upon independent claim 6. Thus, since independent claim 6 should be allowable as discussed above, claims 7-9 should also be allowable at least by virtue of their dependency on independent claim 6. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 11-16 are dependent upon independent claim 10. Thus, since independent claim 10 should be allowable as discussed above, claims 11-16 should also be allowable at least by virtue of their dependency on independent claim 10. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 18-23 are dependent upon independent claim 17. Thus, since independent claim 17 should be allowable as discussed above, claims 18-23 should also be allowable at least by virtue of their dependency on independent claim 17. Moreover, these claims recite additional features which are not

claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 25-27 are dependent upon independent claim 24. Thus, since independent claim 24 should be allowable as discussed above, claims 25-27 should also be allowable at least by virtue of their dependency on independent claim 24. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 29-32 are dependent upon independent claim 28. Thus, since independent claim 28 should be allowable as discussed above, claims 29-32 should also be allowable at least by virtue of their dependency on independent claim 28. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

Claims 34-38 are dependent upon independent claim 33. Thus, since independent claim 33 should be allowable as discussed above, claims 34-38 should also be allowable at least by virtue of their dependency on independent claim 33. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned anticipation rejection of claims 1-14, 16-39 be withdrawn.

II. THE OBVIOUSNESS REJECTION OF CLAIMS 3, 4, 7, 8, 15, 16 & 22

On page 10 of the Office Action, claims 3, 4, 7, 8 and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coyle et al.. On page 11 of the Office Action, claims 15 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Garlepp et al.. These rejections are hereby respectfully traversed.

Under 35 U.S.C. § 103, the Patent Office bears the burden of establishing a *prima facie* case of obviousness. As stated in MPEP § 2143, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the

reasonable expectation of success must both be found in the prior art, not in applicant's disclosure.

A. COYLE ET AL. - 103 REJECTION

The Office Action asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention was made to provide Coyle et al. with "turn around delay" between time slows, since the Examiner takes Official Notice that using a turn around delay between time slots are old and well known for preventing data interference; and using such a "turn around delay" in Coyle et al. involves only routine skill in the art.

The Examiner alleges that "turn around delay" between time slots are old and well known. The Applicant traverses this rejection because there is no support in the record for the conclusion that the identified features are "old and well known." In accordance with MPEP § 2144.03, the Examiner must cite a reference in support of his position.

In response to the Examiner's argument that the purpose of using a "turn around delay" is old and well known in the art as allegedly evidenced by Garlepp, when applying official notice, the Examiner must still provide a valid motivation for modifying

the primary reference, which the Examiner has failed to do so here.

For a proper 103 rejection, there must be some motivation to modify the primary reference as suggested by the Office Action. Any such motivation is completely lacking. The Office Action states that a turn around delay between time slots are old and well known for preventing data interference. However, this is not a perceived problem in the Coyle et al. reference. What is fundamentally lacking in this analysis is any indication in any of the art that data interference is a problem that needs to be solved by turn around delay. The Office Action's statement of motivation is a clear example of improper hindsight.

Controlling Federal Circuit and Board precedents require that the Office Action set forth specific and particularized motivation for one of ordinary skill in the art to modify a primary reference to achieve a claimed invention. *Ruiz v. A.B. Chance Co.*, 234 F.3d 654, 664 (Fed. Cir. 2000) ("[t]o prevent a hindsight-based obviousness analysis, [the Federal Circuit has] clearly established that the relevant inquiry for determining the scope and content of the prior art is whether there is a reason, suggestion, or motivation in the prior art or elsewhere that would have led one of ordinary skill in the art to combine

the references.").

Here, there has been no citation of any teaching anywhere in the art of any need for a implementing turn around delay. The Office Action has failed to identify any teaching of that problem specifically. When a primary reference is missing elements, the law of obviousness requires that the Office Action set forth some motivation why one of ordinary skill in the art would have been motivated to modify the primary reference in the exact manner proposed. *Ruiz*, 234 F.3d at 664. In other words, there must be some recognition that the primary reference has a problem and that the proposed modification will solve that exact problem. All of this motivation must come from the teachings of the prior art to avoid impermissible hindsight looking back at the time of the invention. Because such a proper motivation to combine is missing, the combinations are improper and the rejections should be overturned.

If the approach taken by this Office Action were adopted, in almost every instance, some reason for a modifying a reference could be impermissibly created, unrelated to any actual problem recognized in the art. It is the requirement that the motivation to solve a recognized problem be from the teachings of the art that keeps the application process honest to the goal of avoiding hindsight reconstruction. Indeed, the

very key aspect in determining obviousness should be that there is a clear nexus between the teachings in the art as to the deficiencies in a particular way of doing things and a solution provided by the supplemental references.

The absence of a teaching is the fundamental problem with the rejections proposed by the Office Action and the reason why these combinations are improper. Therefore, there must be some motivation to combine the elements besides for the sake of combining the references. In addition, even if the references could be combined as proposed, the resulting combination would nevertheless fail to render the claim inventions obvious.

Therefore, it is respectfully submitted that the rejections of claims 3, 4, 7, 8 and 22 should be withdrawn and the claims allowed accordingly.

B. GARLEPP ET AL. - 103 REJECTION

On page 11 of the Office Action, claims 15 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Garlepp et al..

35 U.S.C. § 103(c) states the following:

Subject matter developed by another person, which qualifies as prior art only under one or more of subsections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the invention was made,

owned by the same person or subject to an obligation of assignment to the same person.

The present application and the Garlepp et al. patent were, at the time the invention was made, both owned by, or subject to an obligation of assignment to, Rambus Inc..

As common ownership has been established, Garlepp et al. is not valid prior art under 35 U.S.C. § 103(c).

In response to the Examiner's argument that Applicant has not provided any showing, under the requirements of MPEP 706.02(1)(2), the Applicant has made a proper showing by stating that the present application and the Garlepp et al. patent were, at the time the invention was made, both owned by, or subject to an obligation of assignment to, Rambus Inc.. However, Applicant submits herewith as additional evidence, assignment documents clearly showing common ownership at the time the invention was made (see Appendix B and Appendix C).

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 3, 4, 7, 8, 15, 16 and 22 be withdrawn.

III. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

Patent Application
Attorney Docket No.: 57941.000035
Client Reference No.: RA198.P.US

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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Date: September 22, 2004